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ADMITTED IN
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Via Electronic Mail
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And Hand-Delivery

March 1, 2024

Monica Ryan, Esq.
Assistant United States Attorney
405 W. Congress St., Ste. 4800
Tucson, AZ 85701-5040

Re: *United States of America v. Larry Edward Brown, Jr.*
USDC-AZ Case No. CR2024-_____

Dear Monica:

Pursuant to the Federal Rules of Criminal Procedure and other applicable authority, please provide me with the following items of discovery at the earliest practical opportunity.

1. Any written or recorded statement made by the Defendant, or copies thereof, within the possession, custody, or control of the Government.
2. The substance of any oral statement made by the Defendant that the Government intends to offer in evidence at trial.
3. Recorded testimony of the Defendant before a grand jury which relates to the offense(s) charged.
4. All handwritten notes made by Government agents while interviewing the Defendant.
5. Defendant's prior criminal record.

6. An opportunity to inspect and copy all books, papers, documents, photographs and other tangible items within the possession, custody, or control of the Government, which are material to the preparation of Defendant's defense or are intended for use by the Government as evidence in chief at trial, or were obtained from, or belong to the Defendant.
7. Copies of any results of reports of physical or mental examination, and of scientific tests or experiments related to or made in connection with the above captioned matter.
8. A written summary of testimony of expert witness(es) the Government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence describing the expert witness' opinion, the basis thereof, and a copy of the witness' curriculum vitae.
9. Notice of the Government's intention to use any evidence to which the Defendant may be entitled to discovery under Rule 16.
10. All information, no matter the form, source, or nature, which tends to exculpate the Defendant of any offense alleged in the indictment, either through an indication of his innocence or through the potential impeachment of any witness(es) for the Government. This request is made under the authority of *Brady v. Maryland* and its progeny, as well as *Kyles v. Whitley*, as are the following two requests.
11. Copies of any inconsistent statements made by witnesses which the Government intends to use at trial.
12. Pursuant to *United States v. Harris*, please have all Government agents, whether federal, state or tribal, preserve any and all handwritten notes of witness interviews or investigations for possible use at trial as *Jencks* material, and for *in camera* inspection by the Court for possible *Brady* or *Kyles* material.
13. Notice of any act(s) that the Government seeks to use at trial against the Defendant pursuant to Federal Rules of Evidence Rule 404(b) and designate the intended use of the act(s).
14. Pursuant to *United States v. Henthorn*, please produce for inspection by the defense all personnel files of all law enforcement agents the Government intends to call at trial, both in its case in chief as well as rebuttal, relating to acts of dishonesty, false statements, or any other evidence relating to the veracity of the law enforcement agent.

Please be advised that we are willing to enter a *Jencks* waiver in order to facilitate the expeditious exchange of discovery. Thank you in advance for your cooperation in these matters.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Lamm", with a large, loopy initial "J" that extends upwards and to the left.

Jason D. Lamm

JDL/km

cc: Jeffrey H. Jacobson, Esq. (via electronic mail only)